

Message

From: Guiseppi-Elie, Annette [Guiseppi-Elie.Annette@epa.gov]
Sent: 9/28/2016 8:54:38 PM
To: Irvin-Barnwell, Elizabeth (ATSDR/DTHHS/EEB) [jcx0@cdc.gov] [jcx0@cdc.gov]; Ragin, Angela (ATSDR/DTHHS/EEB) [atr0@cdc.gov] [atr0@cdc.gov]; Thomas, Kent [thomas.kent@epa.gov]
CC: Linnenbrink, Monica [Linnenbrink.Monica@epa.gov]; Hauchman, Fred [hauchman.fred@epa.gov]; Orme-Zavaleta, Jennifer [Orme-Zavaleta.Jennifer@epa.gov]
Subject: FW: Tire Crumb Research Study Samples

FYI

From: Guiseppi-Elie, Annette
Sent: Wednesday, September 28, 2016 4:53 PM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: Tire Crumb Research Study Samples

Dear Ex. 6 Personal Privacy (PP)

Thank you for your email and letting me know of your concerns.

As you are aware, the U.S. Environmental Protection Agency (EPA), the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry (CDC/ATSDR), and Consumer Product Safety Commission (CPSC) launched the Federal Research Action Plan (FRAP) in response to concerns raised by the public. EPA and CDC/ATSDR have the lead on the current study on playing fields. CPSC is working on developing a study for playgrounds.

The Research Protocol (available online www.epa.gov/tirecrumb) developed to implement the FRAP has undergone extensive review, including peer review and an Institutional Review Board review. A description of how we are collecting information for the research was posted to the Federal Register Notice for public comment, and it went through an Information Collection Request review conducted by the Office of Management and Budget.

The tire crumb rubber characterization study component of the Research Protocol involves the collection of crumb rubber material from tire recycling/crumb rubber manufacturing plants (i.e., "new" material) and from synthetic turf fields in use around the U.S. The samples are being analyzed in laboratories for a wide range of metals, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). Laboratory analyses will include dynamic emission chamber measurements for VOCs and SVOCs under different temperature conditions and bioaccessibility measurements for metals and SVOCs. Analyses of these samples are informed by the literature review that identified potential constituents in tire crumb material.

From the analysis of the tire crumbs from tire recycling plants and the literature review, we expect to be able to discern tire crumb-specific constituents from those that might be available from ambient sources. The tire crumb manufacturing plant samples will serve as our control samples. While some ambient sources may have similar constituents (e.g., PAHs), we believe that this pilot-scale effort will meet the goals of this study to reduce the uncertainty in tire crumb characterization within the scope of the effort.

While there is merit in considering exposures to natural grass fields, there are a number of challenges associated with using soils as a control for ambient source contamination. These include, for example, the lack of information on intrinsic soil chemical constituents; differential adsorptive/absorptive capacity of the soils and subsequent extraction/emissions; and different microbial and physical/chemical degradation, transformation, or transport of chemicals. Additional research to understand these factors would be necessary for the interpretation of the results of field measurements using soil as the control field measurements. Such an undertaking would delay the current effort, and it is not clear that it would be informative in discerning ambient source contributions to synthetic fields. Because of time and resource constraints, we have chosen to focus data collection efforts on synthetic turf fields and their users.

We do not think we could conduct the research for synthetic and natural fields and users with enough numbers to support examinations of significant differences.

Also, while this study will not be comprehensive enough to say whether or not using tire crumb in synthetic turf fields poses an unacceptable risk, it represents the first time that such a large study is being conducted across the U.S. according to a peer-reviewed protocol. The findings of this study are intended to provide a better understanding of potential chemical and microbiological exposures that athletes and others may experience, and results are expected to inform potential additional investigations.

Thank you again for your interest in our research on this important issue.

Best Regards, Annette.

Annette Guiseppe-Elie, Ph.D., FAIMBE
Associate Director for Exposure Science
NERL, USEPA/ORD
Telephone: 919.541.4986
Mobile: Ex. 6 Personal Privacy (PP)
Email: guiseppe-elie.annette@epa.gov

From: Ex. 6 Personal Privacy (PP)
Sent: Wednesday, September 21, 2016 7:39 PM
To: Guiseppe-Elie, Annette <Guiseppe-Elie.Annette@epa.gov>
Subject: RE: Tire Crumb Research Study Samples

Dear Annette,

While I am pleased to see the EPA move ahead on an issue of public concern, I am concerned that the final testing protocol recently released by your office apparently does not control for ambient sources of possible contamination by sampling natural grass or dirt adjacent to fields with recycled rubber infill. I believe that without such controls, the reliability of the data and its ability to support safety conclusions is questionable, defeating the purpose of the study. Additionally, I am concerned that any report the EPA issues provide the proper context so that the public can understand how these findings relate to the risks of playing on these fields. Reporting the existence of chemical substances in the product without providing information about how they relate to established health-based guidelines could unduly inflame public concerns and defeat the purposes of the research.

While I applaud the hard work that is being done on this issue, I strongly believe that without controlled sampling and use of health-based guidelines for context and comparison, the research may not provide the answers the public expects. Accordingly, Ex. 6 Personal Privacy (PP) does not consent to your request that the tire crumb samples collected from our facility be analyzed and/or tested as part of the "Federal Government Study on the Use of Recycled Tire Crumb in Synthetic Turf Fields."

Best regards,

Ex. 6 Personal Privacy (PP)

From: Guiseppe-Elie, Annette [<mailto:Guiseppe-Elie.Annette@epa.gov>]
Sent: Wednesday, September 21, 2016 12:56 PM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: Tire Crumb Research Study Samples

De [Ex. 6 Personal Privacy (PP)]

Thank you for letting me know that you have the request and that you will let me know your response shortly.

Best Regards, Annette.

From: [Ex. 6 Personal Privacy (PP)]
Sent: Tuesday, September 20, 2016 11:36 AM
To: Guiseppi-Elie, Annette <Guiseppi-Elie.Annette@epa.gov>
Subject: RE: Tire Crumb Research Study Samples

Dear Ms. Guiseppi-Elie,

This confirms that I received your email. We will consider your request and get back to you shortly.

Best regards,

[Ex. 6 Personal Privacy (PP)]

From: Guiseppi-Elie, Annette [mailto:Guiseppi-Elie.Annette@epa.gov]
Sent: Tuesday, September 13, 2016 2:28 PM
To: [Ex. 6 Personal Privacy (PP)]
Subject: Tire Crumb Research Study Samples

Dear Mr. Sako Beudjekian,

I am following up on our phone conversation to get your signed agreement to analyze recycled tire crumb samples from your facility as part of the "Federal Government Study on the Use of Recycled Tire Crumb in Synthetic Turf Fields".

If you agree, please fill and electronically sign the attached form and return to me at your earliest convenience. Regardless, I would appreciate your confirmation that you got this request. Thank you.

As we discussed, the locations of the samples taken for this study will not be published. However, the results of the analyses will be included in a report about the study. Specifically from the attached form:

"All information about your facility will be secure. We keep track of your information using a code number rather than the facility name. We will keep paper records in locked files and electronic records are stored on password protected computers at the USEPA. Only staff working on the project will be allowed to look at the paper and electronic records. Federal policy requires making the data we collect available to the public, but we will not include your name or other identifying information in public release. However, identifying information may be released in the event of a Freedom of Information Act request."

I have enclosed a Fact Sheet with additional information on the study. However, please feel free to call me if you have any questions.

Best Regards, Annette.

Annette Guiseppi-Elie, Ph.D., FAIMBE
Associate Director for Exposure Science, National Exposure Research Laboratory
Office of Research and Development, US Environmental Protection Agency

ED_013150A_00002657-00003

109 T.W. Alexander Drive, MD305-01, Research Triangle Park, NC 27711

Telephone: 919.541.4986, Mobile: Ex. 6 Personal Privacy (PP)

Email: guiseppe-elie.annette@epa.gov